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February 6, 2023

VIA ECF

Hon. Renée Marie Bumb, U.S.D.C.J.
United States District Court
4th & Cooper Streets
Camden, New Jersey 08101

**Re: *Mazahreh, et al. v. Grewal, et al.*
Civil Action No. 1:20-cv-17598-RMB-MJS
Joint Request to Amend 10/12/22 Consent Order (Dkt. 51),
to Extend by Additional 30 Days Plaintiffs' Deadline to
Apply for Award of Counsel Fees and Costs**

Dear Chief Judge Bumb:

As the Court is aware, following the Supreme Court's decision in *New York State Rifle & Pistol Association, Inc. v. Bruen*, 142 S. Ct. 2111 (2022), the parties in this matter collaborated and agreed on a proposed Consent Order for Entry of Final Judgment, enjoining the enforcement of the "justifiable need" provision of N.J. Stat. Ann. § 2C:58-4(c) and N.J. Admin. Code § 13:54-2.4, which the Court entered on October 12, 2022. Dkt. 51. In pertinent part, the Consent Order provides that "Plaintiffs may apply for an award of counsel fees and costs at any time within 90 days of the date of the entry of this judgment." *Id.* ¶ 6. As such, the original deadline for Plaintiffs to do so would be January 10, 2023. At the joint request of the parties, the Court extended it by 30 days, making the current deadline February 9, 2023. Dkt. 54.

The parties now jointly request that the Court amend the Order to permit a further 30-day extension of time for Plaintiffs to apply for such an award, making the new deadline March 13, 2023 (the first court date thereafter).



February 6, 2023

Page 2

As indicated in the parties' January 5, 2023 letter (Dkt. 53), some of the municipal co-defendants needed additional time to obtain formal authority from their governing bodies to engage in settlement negotiation and obtain authority. That was only completed in the past week. Although the parties have proceeded to engage in settlement discussion over the past few days, they will need more time than February 9 to complete that process. All parties wish to avoid a court-filed fee application. They are hopeful that they can amicably resolve this matter, and anticipate that this can be accomplished over the next month.

Thank you for the Court's consideration of this matter.

Respectfully submitted,

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By: /s/ Daniel M. Vannella
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cc: All counsel of record (via ECF)